

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Hearing Date and Time:

June 1, 2023 at 10:00 a.m.

**NOTICE OF DEBTOR'S MOTION FOR ENTRY OF
AN ORDER SEALING THE EXHIBITS TO THE SUPPLEMENTAL
DECLARATION OF JOHN K. KIM REGARDING PLAN SUPPORT AGREEMENTS**

PLEASE TAKE NOTICE that, on June 1, 2023 at 10:00 a.m., or as soon thereafter as counsel may be heard, LTL Management LLC, the above-captioned debtor (the "Debtor"), by and through its proposed counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order pursuant to D.N.J. LBR 9018-1 to seal the exhibits attached to the *Supplemental Declaration of John K. Kim Regarding Plan Support Agreements* (the “Motion”).

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Debtor’s undersigned counsel, (b) the proposed counsel to the Official Committee of Talc Claimants, (c) counsel to the Ad Hoc Group of Supporting Counsel, (d) the proposed legal representative for future talc claimants and her counsel, (e) the Office of the United States Trustee for the District of New Jersey and (f) any other party entitled to notice no later than seven (7) days prior to the hearing.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: May 2, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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